JONATHAN D. DAVIS, P.C.

ATTORNEYS AT LAW

99 PARK AVENUE SUITE 1600 NEW YORK, NEW YORK 10016



TEL: (212) 687-5464 FAX: (212) 557-0565 WWW.JDDAVISPC.COM

June 24, 2011

VIA HAND DELIVERY

The Honorable Denise L. Cote United States District Judge United States District Courthouse 500 Pearl Street, Room 1040 New York, New York 10007

Re: Coach, Inc. v. USA Tiger Group, Inc. et al. 10 Civ. 8400 (DLC)

Dear Judge Cote:

We are the attorneys for Plaintiffs Coach, Inc. and Coach Services, Inc. ("Coach") in the above-referenced action.

We write jointly with counsel for Defendants USA Tiger Group Inc. and Fu Yin Shao ("Defendants") to request that the Court extend the Pretrial Scheduling Order, dated January 24, 2011, by 45 days, or alternatively, allow the parties to adjust the internal dates of the existing scheduling order without changing the deadlines for summary judgment motions or the Pretrial Order. Enclosed is a proposed revised scheduling order.

The parties are exchanging written discovery, and Coach has noticed Defendant Shao's deposition for July 11, 2011. Coach has received Defendants' first production of documents. However, because many of the documents are in Chinese, Coach will need to work with a translator to properly review the documents before deposing the witness. Coach has agreed to adjourn the deposition to set a mutually convenient date for counsel.

A settlement conference is scheduled for July 27, 2011 before Magistrate Judge Gorenstein. In light of the progress of discovery, the additional time requested will give the parties an opportunity to focus on resolving the matter without having to expend the time and cost to conduct further discovery.

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On behalf of all counsel, we respectfully request that the Court extend the Pretrial Scheduling Order by 45 days, or alternatively, allow the parties to stipulate to an extension of the internal discovery dates. This is the parties' first request for an extension of time.

Respectfully submitted,

Jonathan D. Davis

JDD:lh Enclosure

cc: Arlana S. Cohen, Esq. (Via PDF/E-mail)

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